

### **REMARKS**

This Amendment is in response to the Final Office Action mailed July 3, 2007. Claims 21 has been amended. No claims have been added or cancelled. Thus, claims 21-42, 44-61, and 63-70 remain pending. Reconsideration in light of the amendments and remarks made herein is respectfully requested.

#### ***Rejection Under 35 U.S.C. § 102***

The Examiner rejects claims 21-42, 46-48, 51-61 and 67-70 under 35 U.S.C. § 102(e) as being anticipated by Zintel (U.S. Patent No. 6,725,281). Applicants respectfully disagree.

Zintel describes a universal plug and play architecture where a user interface on board a client device may control host devices, such as VCRs, cameras, printers, etc. (Zintel, column 7, lines 44-52; column 48, lines 58-61). When an event occurs at a device, software on that device updates a state table of the device and creates a notification indicating the update. This notification is automatically created. This update is then propagated to the rest of the plug and play devices so that those devices may update their own state tables (Zintel, column 28, lines 64-67).

Claim 21, as amended, recites:

A media capture device system, the system comprising:  
a media capture device with a logical user interface to be supported at least in part by a second device, where the second device includes a user perceivable interface;  
a module on-board the media capture device for determining one or more logical user interface elements of the media capture device that are supported by the second device and that can cause one or more user-perceivable interface elements of the second device to be activated, when the media capture device is coupled with the second device;  
a module for generating at least one high-level event message indicating that an event has occurred that is relevant to the media capture device;

a router on-board the media capture device for determining whether said at least one high-level event message is handled locally at the media capture device or remotely at the second device;  
a mapper on-board the media capture device for mapping said at least one high-level message into at least one lower-level message for controlling one or more hardware elements controlled by the second device; and  
a module for communicating said at least one lower-level message to the second device, such that the second device may activate one or more hardware elements, and activate one or more user-perceivable interface elements of the second device, that are appropriate for said event that has occurred.  
(Emphasis Added)

Applicants respectfully submit that Zintel fails to teach each and every feature as claimed in claim 21.

Zintel describes that a client may utilize a web browser to control a camera, such as by causing the camera to zoom in/out, adjust contrast, etc. (Zintel, column 48, lines 58-61; *See also*, Final Office Action, page 2). Thus, the web browser initiates a command to the controlled device, and the controlled device must carry out the received command. However, the controlled device/camera is never described as performing message routing. That is, when a camera/controlled device receives a command from a user interface, the camera/controlled device is never taught as making a determination of whether or not to handle the command or whether the command should be handled remotely by another device. The concept of a router aboard a camera/controlled device, as claimed by the Applicants, is wholly lacking from Zintel.

The Examiner cites Zintel as teaching the “router on-board the media capture device” as claimed (See Final Office Action, page 3 *citing* Zintel, column 28, lines 64-67). In the passage cited by the Examiner, Zintel states “When a notification arrives the SSDP service will examine the NT header of the message and determine if it is an event

notification. If so, the message is parsed further to determine if it should be forwarded to subscribers" (Zintel, column 28, lines 64-67). As further described in Zintel, simple service discovery protocol (SSDP) is a communications protocol for multicasting messages (See Zintel, column 9, lines 36-58), so that subscribing devices are made aware of the existence and state of other devices in a plug and play network. Thus, Zintel provides for a message notification system which updates subscribers as to various device states, but fails to describe or even suggest a router on board a media capture device. A router in this context means a device which optionally forwards commands for execution.

Further, the message notification system of Zintel is never described as residing within a controlled device, such as a camera or VCR. Zintel describes a system in which controlled devices simply receive and execute commands, and a separate external component, referred to by Zintel as a rehydrator, performs updater distribution. Figure 22 illustrates that the rehydrator is not within the controlled devices. The controlled devices, however, are not described as including any type of router or as making and decision whether events are handled locally or remotely. As such, Zintel fails to teach or suggest "a router on-board the media capture device for determining whether said at least one high-level event message is handled locally at the media capture device or remotely at the second device."

Moreover, Zintel fails to describe a controlled device, such as a camera or VCR as causing the activation of a hardware element on a second device. Rather, an action as described in Zintel merely triggers a notification so that all devices may maintain the current status of every other device in a plug and play network. Even though a VCR state change may cause a client interface to be updated based on a current status update, the

updates are not described as causing the activation of any hardware elements on other devices.

In fact, Zintel teaches exactly the opposite by stating “[t]he primary distinction between a User Control Point 104-105 and a Controlled Device 106-107 is that the User Control Point is always the communication initiator” (Zintel, column 12, lines 56-58). As taught by Zintel, therefore, a camera would not be able to initiate a command to cause an event to occur on another device. Thus, Zintel fails to teach or suggest “a module for communicating said at least one lower-level message to the second device, such that the second device may activate one or more hardware elements, and activate one or more user-perceivable interface elements of the second device, that are appropriate for said event that has occurred,” as claimed.

Therefore, Zintel fails to describe each and every feature as claimed by the Applicants in Claim 21. Applicants respectfully submit that claim 21 is not anticipated by Zintel. Claims 22-42, 44, and 46-58 depend on claim 21, and include additional features and limitations to those contained in claim 21. Thus, for similar reasons to those discussed above with respect to claim 21, claims 22-42, 44, and 46-48 are also not anticipated by Zintel. The Applicants respectfully request withdrawal of the rejections of claim 21-42, 44, and 46-48 under § 102.

Claim 51 recites:

An interface system allowing a client device to be partially supported by a host device, the system comprising:  
a module on-board the client device for determining one or more user interface elements of the client device that are supported by the host device and that can cause one or more user-perceivable interface elements of the host device to be activated, when the client device is coupled with the host device;  
an onboard interface engine on the client device for generating at least one high-level event message indicating that an event has occurred on the client device;  
a router in the client device to determine whether the at least one high level event message should be handled locally at the client device or remotely at the host;  
a state transition table to transition the client device to the a new state based on the at least one high level event and the client device's present state;  
a module to update the client device's current state information; and  
a mapper for mapping said at least one high-level message into at least one lower-level message for controlling one or more hardware elements controlled by the host device, and for triggering the activation of one or more user-perceivable interface elements of the host device.  
(Emphasis Added)

As discussed above, Zintel is completely silent as to making any determination of message routing on board a media capture device. Even if the system of Zintel were to make a routing determination, the determination is simply not performed “on board” a media capture device. Because claim 51 claims “a router in the client device to determine whether the at least one high level event message should be handled locally at the client device or remotely at the host,” claim 51 is not anticipated by Zintel. Furthermore, claims 52-61 and 63-65 depend on claim 51, and include additional features and limitations. Thus, claims 52-61 and 63-65 are also not anticipated by Zintel.

Claim 67 recites:

A method comprising:  
determining one or more user interface elements of a media capture device that are supported by a second device and that can cause one or more

user-perceivable interface elements of the second device to be activated, when the media capture device is coupled with the second device; receiving a notification at the media capture device, indicating that an event has occurred with respect to the media capture device;  
determining, at a router on-board the media capture device, whether the event should be handled locally at the media capture device or remotely at the second device;  
when the event is to be handled locally, processing the event locally at the media capture device;  
transmitting a message to the second device, intended to activate a hardware element on the second device;  
activating a hardware element and the one or more user-perceivable interface elements on the second device, in response to the message.  
(Emphasis Added)

As discussed above, Zintel is completely silent as to making any determination of message routing on board a media capture device. Thus, Zintel fails to teach or suggest “determining, at a router on-board the media capture device, whether the event should be handled locally at the media capture device or remotely at the second device,” as claimed in claim 67. Therefore, Zintel fails to anticipate claim 67. Claims 68-70 depend on claim 67, and include additional features and limitations. Thus, claims 68-70 are also not anticipated by Zintel.

Therefore, Applicant respectfully requests that the Examiner withdraw the rejection of claims 21-42, 46-48, 51-61 and 67-70 under 35 U.S.C. § 102(e) as being anticipated by Zintel.

### ***Rejection Under 35 U.S.C. § 103***

The Examiner rejects claim 49 under 35 U.S.C. § 103(a) as being unpatentable over Zintel (U.S. Patent No. 6,725,281) in view of alleged knowledge in the art.

As discussed above, Zintel fails to describe or even suggest message routing on board a media capture device. Furthermore, the Examiner states that “plug and play

devices, like those found in Zintel may be embedded within a host device” (Final Office Action, mailed 7/03/07, page 9). Applicants respectfully disagree with the Official Notice. Zintel describes a plug-and-play architecture for remotely controlling devices, such as cameras, VCRs, etc. from a remote web interface (Zintel, Abstract; column 7, lines 44-52; column 48, lines 58-61). However, as described in Zintel, the “devices” are not taught as being embedded in other devices. Rather, Zintel provides for an attachment system, the Universal Plug and Play system, which is the opposite of an embedding system. For sake of argument, even if Zintel did provide for the embedding of controlled devices in a host, Applicants fail to see how plug-and-play devices, such as cameras, VCRs, etc. in Zintel could be embedded into a remote web browser. Therefore, Applicants respectfully submit that the Official Notice has been overcome.

Applicant respectfully requests that the Examiner withdraw the rejection of claim 49 under 35 U.S.C. § 103(a) as being unpatentable over Zintel (U.S. Patent No. 6,725,281) and alleged knowledge in the art.

The Examiner rejects claims 50 and 66 under 35 U.S.C. § 103(a) as being unpatentable over Zintel in view of Armga (U.S. Patent No. 6,390,371). Applicants respectfully disagree. As discussed above, Zintel fails to describe or suggest making any routing decisions “on board” a media capture device.

Armga describes a user interface generation scheme (Armga, Abstract). To ensure that a user interface is properly displayed, an intermediary obtains UI specifications and causes a display which is appropriate for the target device (Armga, column 3, line 36 to column 4, line 9). However, Armga’s device-specific UI generation fails to describe or suggest routing messages on board a media capture device.

Therefore, Zintel and Armga, alone or in combination, fail to render claims 21 and 51, and thus dependent claims 50 and 66, obvious. Applicant respectfully requests that the Examiner withdraw the rejection of claims 50 and 66 under 35 U.S.C. § 103(a) as being unpatentable over Zintel in view of Armga.

The Examiner rejects claim 45 under 35 U.S.C. § 103(a) as being unpatentable over Zintel in view of Cortjens (U.S. Patent No. 5,526,037). Applicants respectfully disagree. As discussed above, with respect to independent claim 21, Zintel fails to describe or suggest making any routing decisions “on board” a media capture device.

Cortjens describes generating control signals at local peripheral devices, such as a mouse or joystick (Cortjens, column 5, line 59 to column 6, line 2). The peripheral device is connected to a controller so that when the controller receives a signal/command from the peripheral device, the controller performs a signal conversion before sending the signal to a local or remote system (Cortjens, column 5, lines 55-59; column 8, lines 37-39). Thus, Cortjens describes a host or server device that performs signal routing, which is separate and distinct from the peripheral device that generates control signals. In Cortjens the peripheral devices are a mouse, joystick, etc. and the peripheral devices are not taught as performing any routing functions. Thus, Cortjens also fails to describe or suggest routing messages on board a media capture device, as recited in claim 21.

Therefore, Zintel and Cortjens, alone or in combination, fail to render claim 21, and thus dependent claim 45, obvious. Applicant respectfully requests that the Examiner withdraw the rejection of claim 45 under 35 U.S.C. § 103(a) as being unpatentable over Zintel in view of Cortjens.



***Conclusion***

Applicant reserves all rights with respect to the applicability of the doctrine of equivalents. Applicant respectfully requests that a timely Notice of Allowance be issued in this case. If a telephone interview would expedite the prosecution of this application, the Examiner is invited to contact William L. Jaffe at (714) 557-3800.

Respectfully submitted,

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